

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

1:20-CV-12229

Umuoji Improvement Union (North America) Inc.)
(North America) Inc.)
)
)

Vs.)
)
)

Umuoji Improvement Union (North America) Inc.)
Umuoji Improvement Union, Massachusetts Inc.)
Victor Ide-Okoye, and Ogor Okoye)
_____)

**DEFENDANTS' REQUEST FOR LEAVE OF COURT TO FILE A RESPONSE TO
PLAINTIFF'S COUNSEL SUBMISSION ON MAY 17, 2021
(Doc#s 38 and 39)**

Now comes Defendants, Umuoji Improvement Union (North America) Inc. Massachusetts, Inc. (hereinafter referred to as "UIUNA MA"), Victor Ide-Okoye, Umuoji Improvement Union, Massachusetts, Inc. and Ogor Okoye (collectively, "Defendants") in the afore-mentioned matter and respectfully request this Honorable Court to allow them to submit a response to Plaintiff attorney's misrepresentation to this court on May 17, 2021 relative to the emails parties submitted pursuant to the Courts Order dated May 4, 2021 (Notice).

As reasons therefore, counsel states that all statements she made to the court in her submission titled, Defendants' Notice to Court Pursuant to the Court's Memorandum and Order on Plaintiff's Motion for Preliminary Injunction dated May 4, 2021 were accurate while Plaintiff's counsel purposefully misrepresented the facts in this case. A copy of the proposed reply is attached herein as **Exhibit 1**.

As reasons therefore, undersigned counsel wants to correct the record by presenting the facts of what transpired in this matter relative to the issue raised by Plaintiff's counsel.

Respectfully submitted,

/s/
Ogor Winnie Okoye
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Dated May 19, 2021

CERTIFICATE OF SERVICE

I hereby certify that I have served Defendant's Motion for Leave of Court to file a response to Plaintiff's Motion for Leave of court to File a Reply (Doc#38 and 39) via electronic filing on Plaintiff's Counsel, Travis Pregent, Esq. on the date set forth below in accordance with the Federal Rules of Civil Procedure and the Court's local rules.

Dated: May 19, 2021

/s/Ogor Winnie Okoye